

## **2004 – 2005 W-2 and Related Programs Monitoring Plan**

### **Overview**

The fluid nature of the environment in which the Wisconsin Works (W-2) program operates requires a monitoring effort that is flexible--able to conduct regular monitoring activities, and able to ramp up in-depth reviews of agency practices when the need for these reviews is identified. To achieve this degree of consistency and flexibility, the Division of Workforce Solutions (DWS) W-2 monitoring operation will employ four types of monitoring activities:

- monthly monitoring of agency performance and administrative practices;
- focused reviews of specific case management practices employed by the agencies;
- as-needed reviews of agency plans, subcontracts, and administrative practices; and
- DWS Central Office reviews of some agency statistics, which are shared with the regions for potential follow-up, when necessary.

### **Monthly Monitoring**

Staff in the Bureau of Partner Services (BPS) regional offices will monitor the agencies in each Workforce Development Area (WDA) monthly on four categories of activities--case management practices, agency performance, financial management, and constituent complaints, using a series of customized reports. The chief purpose of these reviews will be to identify trends in each agency or the region as a whole that may pose a risk to the program. BPS staff located in the DWS central office will also monitor these reports for statewide trends that may need attention.

### **Case Management Reviews**

Reports designed to scan for anomalies in case management activities will be used to monitor each agency's caseload for practices that could be improved, or areas where training or technical assistance might be required. These reports will track such indicators as:

- lack of case activity for over 45 days;
- placement in Case Management Services (CMS) for more than 30 days;
- unusual or inappropriate changes in placement;
- assessments that have not been completed within the 30-day timeframe;
- sanctions that may be inappropriate (e.g. sanctioning for an activity that wasn't assigned);
- case extension approval and denials; and
- low percentage of Barrier Screening Tool (BST) completions.

Each month, regional staff will share this information with their agencies. In situations where there are a large number of anomalies, the regional staff will ask for an explanation from the agency. If the appearance of these items persists for three months,

the regional staff will review a sample of that agency's cases to determine if there is a pattern of discrepancies in that agency's case management practices.

### **Performance Standards and Outcomes**

Using customized performance standard reports that are sorted by WDA, BPS staff will regularly monitor the following activities for indications that the agency's performance is not attaining established standards for the W-2 program:

- entered employment percentages;
- basic educational activities;
- gains in literacy and numeracy;
- degree or certificate attainment;
- assessment of W-2 placements;
- entry of extension decision;
- customer satisfaction;
- employment placement rates;
- job retention rates; and
- earnings gain.

### **Financial Reports**

Agency performance in the fiscal arena will be recorded in the financial reports. These will be used to monitor agency spending rates, proximity to administrative caps, and expenditure profiles. Reports that will be used include:

- Payment and Expenditure Reports;
- Central Office Reporting (COrE) Monitoring Tool; and
- Other Online Reports in the Financial Data Warehouse.

### **Complaint Tracking**

BPS Central Office will also monitor trends in the types of complaints received from constituents regarding the W-2 program or the agencies delivering its services. Using the Complaint Tracking System, staff will be able to see the issues expressed in written complaints from around the state. Complaints received in the regional offices via email or telephone will be compiled in a log that will be reviewed in central office. Statewide trends identified and possible strategies to alleviate them will be discussed with staff in BWP, BWI and the Partner Training Section of BPS.

### **Collaboration Monitoring**

Through the targeted review process BPS will monitor the working relationships between the W-2 Agencies and their partners (Job Centers, Child Protective Service Agencies, Division of Vocation Rehabilitation, etc.). The Department of Health and Family Services and the BPS regional staff will partner to monitor the working relationships between the W-2 Agencies and the County Department of Human/Social Services Child Protective Service Agencies.



## Targeted Reviews

Some monitoring activities will be conducted by review teams that will be assembled at a specified time for a specific effort. Regional staff and division management will determine the need for a focused review through trends seen in monthly monitoring of performance outcomes, financial reports, case management practices, and validation of data in Client Assistance for Reemployment and Economic Support (CARES). Also, complaints or other indications of systemic problems received from clients, advocates or other agencies could trigger a focused review. The nature of the issue to be investigated will determine the scope of the review—both in the geographic area it will cover and the data it will involve.

A team will consist of three to five members. The team lead will be responsible for coordinating the activities of the team. If the scope of the review covers agencies in multiple WDAs, the membership of the team could change as the focused review rolls out from region to region, but the lead will stay with the team until the review is completed. Most reviews will involve a combination of on-site and desk reviews. When that is the case, the review team may request the assistance of other regional staff to complete the desk reviews, but on-site visits will be conducted by the team members in the region where the focused review is being completed.

When the review is completed, the lead will coordinate the completion of a report that will include each agency's results, agency required actions, and recommendations for the Division to consider in alleviating any problems identified, e.g. technical assistance, policy clarification, training, etc. The DWS contract manager for each agency will be responsible for reviewing the report and following up with her/his agencies, if necessary. The results of the follow-up with agencies will be incorporated into the target review documentation.

Each focused review should be repeated in the following year to determine what, if any, of the recommended actions were implemented, and what improvements have resulted. Some of the efforts that could be conducted by a targeted review team are:

- sanctioning reviews;
- data validation of performance standards;
- verification reviews;
- BST completion reviews; and
- Child Care reviews.

## **As Needed Reviews**

Regional office staff will conduct the following reviews when they determine it is necessary for any of the agencies for which it is responsible:

### **Administrative Reviews**

This is an onsite review designed to provide information on an agency's organizational and operational functions. These reviews are typically requested by the agency to be performed on their Department of Workforce Development (DWD) programs but can result from the state initiating the study.

### **Corrective Action Plan Monitoring**

This is a monthly review of the performance of an agency under a corrective action plan to ensure the agency is meeting, or exceeding, the requirements of the plan and the program.

### **Subcontract Reviews**

This is a review of all W-2 subcontracts designed to ensure compliance with DWD financial and programmatic requirements prior to implementation of sub-contracts by the agency.

### **W-2 Plan Modifications**

As agencies modify their operations, their plan must reflect that change. This monitoring effort ensures that each agency's W-2 and Related Programs Plan is up-to-date and accurately describes current program operations in the specific geographic area.

### **W-2 Agency Reviews**

These reviews consist of onsite interviews and evaluations of case data designed to identify how a W-2 Agency's administration of the W-2 program complies with statute and policy, and to evaluate the effectiveness of an agency's delivery of services.

### **W2 FSET Worksite Reviews**

This is a review of worksites at which W-2 and Food Stamp Employment and Training (FSET) participants are employed.

## **Central Office Monitoring with Regional Staff Follow-up**

BPS central office staff will monitor the following activities and will share the information with the contract managers to determine if follow-up is necessary.

<b>Fair Hearing Monitoring</b>	BPS central office staff will review fair hearing decisions and inform the BPS regional staff responsible for that agency in cases where follow-up action with the agency may be necessary. If a trend is identified, central office staff will work with the policy units and/or the BPS Partner Training Section to alleviate the problem.
<b>Fact Finding Monitoring</b>	BPS central office staff will review the results of fact finding hearings to identify problems and trends within the agency. This information will be passed on to the regional staff person responsible for the agency in question.
<b>BST Completion Rate</b>	BPS central office staff will monitor agency use of the BST to ensure that they are properly assessing potential barriers to employment a participant may face, and that the agency is following up.
<b>Trial Jobs component</b>	Cases will be reviewed to determine the wages, the type of employment, and the start and end date of the placement. For those now in unsubsidized employment and in the follow-up phase, BPS central office staff will review the case to determine if the same or a new employer employs the former participant, and to determine the wages paid to the now unsubsidized employee.
<b>DWS Financial Monitoring</b>	This includes on-site and desk reviews of an agency's policies, procedures and expenditures to ensure that they adhere to the financial requirements of the W-2 contract. It is coordinated by the Bureau of Division-wide Services (BDS), DWS.
<b>DWS Civil Rights Compliance Plans and Reviews</b>	On-site and desk reviews are designed to determine whether agencies and organizations receiving federal financial assistance are complying with the various Civil Rights requirements and standards. These reviews will be conducted by the Human Resources Unit in BDS.

## Monitoring Results

A hierarchy of feedback types, from technical assistance to demands for immediate changes in program operations, will be utilized by DWS in response to findings from various monitoring efforts.

A Recommendation is a suggested change in the W-2 agency's administration of the W-2 and Related Programs that may improve the programs. Recommendations may include technical assistance that focuses on sharing best practices from other W-2 agencies and other quality improvement activities. Technical assistance will be provided on-site at the W-2 agency, by phone, by e-mail, or in a formal written document as the situation indicates.

A Required Action is an official request by the Division conveyed in writing to the W-2 agency to develop and implement procedures that accurately reflect the W-2 and Related Programs policies and procedures. A Required Action typically requires a response by a set deadline. It falls short of a Corrective Action in terms of its seriousness, but it is deemed to be an important change in a W-2 agency's policies or procedures in order to maintain the compliance, quality, or integrity of the program.

A Corrective Action is an official demand by the Division as a result of agency non-compliance to modify, cease, or implement a specific practice or action. In the 2004-2005 W-2 and Related Programs Contract, under section 17.2.2, Corrective Action Plan, "the Department will notify the W-2 agency of items which require a Corrective Action Plan and the time allowed, which shall be no less than ten (10) business days, and no more than thirty (30) calendar days, or longer if pre-approved by the Department, to implement the Corrective Action Plan." Further in section 17.2.3, Failure, "if the W-2 agency fails to fully implement substantial required Corrective Action(s), the Department may revoke the W-2 agency's Right of First Selection status."